

RESPONSE TO OFFICE ACTION MAILED APRIL 7, 2006
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REMARKS

The Applicants intend the present response to be fully responsive to the rejection raised in the Office Action, and believe the present response places the application in condition for allowance. Further, the Applicants do not acquiesce to any portion of the Office Action not particularly addressed. The Applicants respectfully request favorable reconsideration and allowance of the application.

As set forth the Office Action, the Office noted that (i) claims 1-39 are pending ("pending claims") and (ii) pending claims 1-3 12-24 and 26-39 are rejected under the provisions of 35 U.S.C. §§102 and 103 based on either one or more cited references or opinions of the Office. In light of the following discussion, the Applicants submit that none of the pending claims are rendered anticipated or obvious in view of the cited references. Thus, the Applicants believe that all of the claims 1-39 are patentable and in condition for allowance.

I. ALLOWABLE CLAIMS

The Applicants note that the Office indicated that dependent claims 4-11 and 25 would be allowable if rewritten in independent form including all of the elements of their respective independent claims and intervening claims, if any. The Applicants thank the Office for indicating allowable subject matter, but nonetheless submit, for the reasons set forth below, independent claims 1 and 22 (from which dependent claims 4-11 and 25 depend) are allowable over the prior art of record. Thus, the Applicants submit that each of the dependent claims 4-11 and 25 is allowable, and in turn, request that the objection to such claim be withdrawn.

II. REJECTIONS

Response to §102(e) Rejection of Claims 1-3, 12-24, and 26-39

The Office rejected claims 1-3 12-24 and 26-39 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,642,884 granted to Bryant et al. ("*Bryant*"). The Applicants respectfully traverse this rejection.

The Office contended that *Bryant* teaches all of the claimed elements of the claims 1-3 12-24 and 26-39, including the claimed elements directed to *long term satellite tracking data* or "*long-term STD*." In support of this contention, the Office stated "Bryant et al teach a position location system, a receiver, and a method

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including receiving (1; col. 3, lines 35-47) long term satellite tracking data at a remote receiver from a server, computing (20; fig. 2) acquisition assistance data using the long term satellite tracking data at the remote receiver, and receiving 1 satellite signals at the remote receiver using the acquisition assistance data."

More specifically, *Bryant* states, with respect to the claimed element "receiving long term satellite tracking data at a remote receiver from a server," "[g]enerally, the device detects and acquires a set of satellites for tracking based upon information from internally stored almanac data and its approximate location received from the aiding source" (emphasis added). *Id.*, at col. 3 lines 35-38. "Once acquired and in the presence of weak signals, the device relies upon the code phases of the weak satellite signals rather than the transmission time data within the weakened signal." *Id.*, at col. 3 lines 38-41. "The code phases of the signals are measured at the same instant so that there is a common time of receipt." *Id.*, at col. 3 lines 41-43. "Then, by determining the differences between the code phases, the resulting values or code phase differences, are taken as ambiguous measurements of the differences in the times of transmission of the satellite signals." *Id.*, at col. 3 lines 43-47.

In addition, *Bryant* states, with respect to the claimed elements "computing acquisition assistance data using the long term satellite tracking data at the remote receiver, and receiving 1 satellite signals at the remote receiver using the acquisition assistance data," "FIG. 2 outlines an example procedure for a GPS receiver that ensures that any strong signals are acquired first using a high threshold" (emphasis added). *Id.*, at col. 8 lines 58-60. The Applicants further note that reference numeral "20" refers to a microprocessor for carrying out various functions of the "SPS receiver 1." See *Id.*, starting at col. 12, line 30.

The Applicants' invention, in contrast to *Bryant*, includes a combination of elements directed to *long-term STD*, which, as noted in the present specification and in the previous response, (i) has a duration of validity that distinguishes it from conventional ephemeris information, and (ii) is valid longer (in time) than such conventional ephemeris information, which is typically valid for no longer than about 4 hours. Specifically, the Applicants' independent claim 1 positively recites:

"A method, comprising:
receiving *long term satellite tracking data* at a remote receiver
from a server;

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computing acquisition assistance data using *said long term satellite tracking data* at said remote receiver; and
receiving satellite signals at said remote receiver using said acquisition assistance data" (emphasis added).

Each of the other independent claims 22, 29 and 34 include one or more claimed elements directed to the *long-term STD*.

The Applicants note that the *Bryant* specifically states:

"As previously described, the aiding data used in accordance with the present invention is limited to information that includes an approximate location for an SPS receiver and the positions and velocities of a specific set of satellites. This information is determined and provided through a request/response sequence. Satellite clock corrections should be included in the aiding data. These are provided in the satellite navigation messages and may be as large as 1 ms. Thus it is essential to apply these corrections in order to accurately compute the pseudorange differences. Instead of supplying satellite positions and velocities, the aiding source can supply corrections for the satellite positions, velocities, accelerations and/or further position derivatives computed from the satellite almanac data. This almanac data may also be used to compute coarse satellite positions, velocities and other derivatives which are corrected using aiding data for use in performing the location solution.

This is advantageous as it allows the satellite positions to be predicted for relatively long periods (e.g. tens of minutes) with adequate accuracy for computing the receiver location and yet remains undemanding in terms of the amount of aiding data to be transmitted to the receiver" (emphasis added). *Id.*, at col. 4, lines 44-65.

The Applicants submit that, clearly, this disclosure (and the rest of *Bryant*) falls far short of disclosing the Applicants' invention, and to the contrary, discloses aiding information that is valid for a period even shorter in duration than conventional ephemeris information, which, as noted, is typically valid for no longer than about 4 hours. See, e.g., the present application and the Applicants' previous response.

Since *Bryant* lacks at least one element of each of the independent claims 1, 22, 29 and 34, namely the claimed elements *long-term STD*, the Applicants submit that *Bryant* does not anticipate the claimed invention under 35 U.S.C. §102(e). As such, the Applicants submit that each of the independent claims 1, 22, 29 and 34 are patentable over *Bryant*.

Claims 2-3, 12-21, 23-24, and 26-39 depend, either directly or indirectly, from one of the independent claims 1, 22, 29 and 34. Since the Applicants submit that *Bryant* fails to anticipate the independent claims 1, 22, 29 and 34 for the reasons set

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forth above, the Applicants further submit that *Bryant* likewise fails to anticipate each of the dependent claims 2-21, 23-28, 30-33 and 35-39. Thus, the Applicants submit that the claims 2-21, 23-28, 30-33 and 35-39 fully satisfy the requirements of 35 U.S.C. §102, and therefore, are allowable.

CONCLUSION

In view of the foregoing, the Applicants submit that none of the claims presently in the application are anticipated under the provisions of 35 U.S.C. § 102(e). Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Office believes that any unresolved issues still exist or if, in the opinion of the Office, a telephone conference would expedite passing the present application to issue, the Office is invited to call the undersigned attorney directly at 732-978-4899 or the office of the undersigned attorney at 732-978-7100 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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